



October 24, 1995

HAND DELIVERED

Mr. William F. Caton
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D. C. 20554

FILED
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FCC MAIL ROOM
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Re: In the matter of Streamlining the Commission's Rules and Regulations for Satellite Application and Licensing Procedures, IB Docket No. 95-117.

Dear Mr Caton:

Enclosed herewith is one (1) original, and 5 (five) copies of our reply to the comments submitted to the Notice of Proposed Rulemaking in IB Docket 95-117.

Sincerely,

COMSEARCH

Christopher R. Hardy
Director, Microwave and Satellite Services
Enclosure

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

OCT 25 1995

In the matter of

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Streamlining the Commission's)
Rules and Regulations for Satellite) IB Docket No. 95-117
Application and Licensing Procedures)

To: The Commission

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REPLY COMMENTS OF COMSEARCH

Comsearch, hereby respectfully submits its reply in response to the comments filed to the Notice of Proposed Rulemaking ("NPRM") in the above captioned proceeding.

We endorse Commission action that will expedite the Part 25 licensing process in light of in-service demands placed upon carriers in today's market. Permitting pre-authorization construction and streamlining reporting requirements as outlined in the NPRM is certainly a good step in this regard. At the same time consideration must be given to preserve the integrity of the systems from either causing or receiving potential interference.

Eliminating Application Requirements for Inclined Orbit Operations

We disagree with the comments of Keystone regarding the need for updated frequency coordination for C-band earth stations uplinking

to satellites in inclined orbits.¹ Contrary to Keystone's remarks, the initial frequency coordination that may have cleared the earth station for operations with geostationary satellites is not always sufficient to clear the same earth station operating with satellites in an inclined orbit. Earth stations communicating with a satellite in an inclined orbit are likely to present greater interference potential to terrestrial systems than a satellite operating with no inclination because of lower elevation angles. The lower elevation angles result in decreased discrimination angles and greater earth station antenna gain towards terrestrial facilities. This results in greater potential interference into the terrestrial facilities. Depending upon the location of the earth station relative to the location of the satellite in inclined orbit and the amount of inclination of the satellite, the gain of the earth station can increase up to 15 dB. Since communication with satellites operating in an inclined orbit could have a significant impact on the interference environment, terrestrial users should be given the opportunity to review the impact of possible interference into their systems. This is achieved through frequency coordination.

Modifications not requiring prior authorization.

Comsearch generally agrees with the comments filed in support of

¹ See, comments of Keystone, page 3.

the Commissions proposal to eliminate prior authorization requirements for certain "minor" modifications.² However, it was apparent from the comments that further definition of what constitutes a minor modification is necessary. The criteria should be based upon interference considerations affecting both satellites and shared band terrestrial systems. For example, EDS claims that prior authorization should not be required for a licensee's substitution of an antenna manufacturer or antenna model number different than that initially licensed.³ While we agree that the potential interference into receiving satellites may be negligible, the possible change in discrimination pattern of the new antenna can result in significant interference into shared band terrestrial facilities. Various interpretations of the guidelines could be reduced if a format similar to Part 21.42 was used. We would also urge the Commission to make clearer the requirement for frequency coordination, regardless of the type of modification. As stated in Section 21.100 (d)(viii) notification is required for minor as well as major changes.⁴ We recommend that the ",as necessary," text found in the first sentence of the proposed section 25.118 be

² See comments of MCI, Motorola Satellite Communications, Inc AT&T Corp, EDS Corporation, Keystone, and Loral/Qualcomm Partnership, L.P.

³ See comments of EDS Corporation, page 6.

⁴ Section 21.100 (d)(viii) states "If after coordination is successfully completed, it is determined that a subsequent change could have no impact on some carriers receiving the original notification, it is not necessary to coordinate the change with such carriers. However, these carriers shall be notified of the change and the opinion that coordination is not required for such change."

removed to help clarify this requirement.

Respectfully Submitted,

COMSEARCH

Prepared by: 

Christopher R. Hardy

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CERTIFICATE OF SERVICE

I, Meredith S. Workman, a secretary at Comsearch, do hereby certify that the attached Reply Comments were mailed on October 24, 1995, by first class mail, postage prepaid, to the following:

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